

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

ADIRONDACK INSURANCE EXCHANGE,

Plaintiff,

- against -

HSBC BANK, USA, N.A. ISAOA, STEVEN  
BRESLER and GERRY-LYNN-STOHR,

Defendants.

Docket No.: 1:23-cv-01397 (TJM)(DJS)

**Defendant Steven Bresler's Answer to  
Defendant HSBC Bank, USA, N.A.  
ISAOA's Cross-Claim**

Defendant, STEVEN BRESLER, by his attorney, the Law Office of Craig A. Blumberg as and for his answer to defendant HSBC Bank, USA, N.A. ISAOA's ("HSBC") Cross-Claim, states as follows:

1. Defendant denies the allegations in paragraph 65 of defendant HSBC's Cross-Claim to the extent any issues related to HSBC are the subject of a separate pending litigation.
2. Defendant denies the allegations in paragraph 66 of defendant HSBC's Cross-Claim to the extent any issues related to HSBC are the subject of a separate pending litigation.
3. Defendant denies the allegations in paragraph 67 of defendant HSBC's Cross-Claim to the extent any issues related to HSBC are the subject of a separate pending litigation.
4. Defendant denies the allegations in paragraph 68 of defendant HSBC's Cross-Claim to the extent any issues related to HSBC are the subject of a separate pending litigation. Defendant denies knowledge and information on any issues related to any mortgage or its requirements therein with respect to insurance.

5. Defendant denies the allegations in paragraph 69 of defendant HSBC's Cross-Claim to the extent any issues related to HSBC are the subject of a separate pending litigation. Defendant denies knowledge and information on any issues related to any mortgage or its requirements therein with respect to insurance.
6. Defendant denies the allegations in paragraph 70 of defendant HSBC's Cross-Claim to the extent any issues related to HSBC are the subject of a separate pending litigation.
7. Defendant denies the allegations in paragraph 71 of defendant HSBC's Cross-Claim.
8. Defendant denies the allegations in paragraph 72 of defendant HSBC's Cross-Claim to the extent any issues related to HSBC are the subject of a separate pending litigation.
9. Defendant admits the allegations in paragraph 73 of defendant HSBC's Cross-Claim.
10. Defendant admits the allegations in paragraph 74 of defendant HSBC's Cross-Claim.
11. Defendant denies the allegations in paragraph 75 of defendant HSBC's Cross-Claim to the extent any issues related to HSBC are the subject of a separate pending litigation. Defendant denies knowledge and information on any issues related to any mortgage or its requirements therein with respect to insurance.
12. Defendant denies the allegations in paragraph 76 of defendant HSBC's Cross-Claim to the extent any issues related to HSBC are the subject of a separate pending litigation. Defendant denies knowledge and information on any issues related to any mortgage or its requirements therein with respect to insurance. Defendant denies knowledge and information as to insurable interest.
13. Defendant denies the allegations in paragraph 77 of defendant HSBC's Cross-Claim to the extent any issues related to HSBC are the subject of a separate pending litigation. Defendant denies knowledge and information on any issues related to any mortgage or its requirements therein with

respect to insurance. Defendant denies knowledge and information as to insurable interest and rescission.

14. Defendant admits the allegations in paragraph 78 of defendant HSBC's Cross-Claim.
15. Defendant denies the allegations in paragraph 79 of defendant HSBC's Cross-Claim to the extent any issues related to HSBC are the subject of a separate pending litigation.
16. Defendant denies the allegations in paragraph 80 of defendant HSBC's Cross-Claim to the extent any issues related to HSBC are the subject of a separate pending litigation. Defendant denies knowledge and information on issues related to New York Real Property Law 254(4).
17. Defendant denies the allegations in paragraph 81 of defendant HSBC's Cross-Claim to the extent any issues related to HSBC are the subject of a separate pending litigation.
18. Defendant admits the allegations in paragraph 82 of defendant HSBC's Cross-Claim.
19. Defendant denies the allegations in paragraph 83 of defendant HSBC's Cross-Claim to the extent any issues related to HSBC are the subject of a separate pending litigation.
20. Defendant denies the allegations in paragraph 84 of defendant HSBC's Cross-Claim to the extent any issues related to HSBC are the subject of a separate pending litigation.

Dated: New York, New York  
January 30, 2024

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To: All parties via ECF